

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

MOBILE RELAY ASSOCIATES)	WT Docket No. 13-212
)	
To Operate on Frequency Pairs 462/467.5375 MHz and)	Public Notice, DA 13-1838
462/467.7375 MHz at Multiple Locations in the)	
Los Angeles, Denver, Las Vegas, and Miami)	
Metropolitan Areas)	

To: Chief, Wireless Telecommunications Bureau

SUPPLEMENTAL RESPONSE TO MR. KNOWLES

Mobile Relay Associates (“MRA”), by its attorneys and pursuant to Section 1.45 of the Commission’s rules, hereby submits this Supplemental Response to Mr. Knowles (“Supplement re Knowles”) in this proceeding. This Supplement re Knowles responds only to the two filings made on November 4, 2013, by Mr. P. Randall Knowles.

For the most part, MRA incorporates its previous Supplement, filed November 4, 2013 herein in response to the Personal Radio Steering Group (“PRSG”). In particular, MRA notes, again, that any past interference to GMRS caused by 11 kHz-wide FRS transmissions has absolutely no probative value in assessing whether there would be interference from MRA’s 4 kHz-wide transmissions. Those 11 kHz-wide FRS transmissions *spectrally overlap* with GMRS – FRS interference comes from in-channel transmissions, not from out-of-channel transmissions or from inability of older GMRS equipment to filter. *See* MRA Supplement, p.3. The only real-world experience is from Public Safety licensees using the same aged equipment as normally used by GMRS licensees. That experience proves an absence of harmful interference. *Id.*, p.4.

Also, as discussed by length by MRA in its prior Supplement, there is no material power difference between GMRS, on the one hand, and either MRA’s proposed Part 90 operations or

the wideband analog Public Safety operations that are adjacent to MRA's existing 4 kHz operations, on the other hand.¹

While Mr. Knowles’ policy arguments are interesting, neither he nor anyone else affiliated with GMRS has ever filed any request for waiver or rulemaking or otherwise to open GMRS to the kinds of novel remote receiver linking or other innovations he now raises. If MRA had not filed its own proposal, nobody affiliated with GMRS would have ever raised any such suggestions for GMRS. MRA disagrees with Mr. Knowles – the public interest lies with relieving the horrible congestion in Part 90 PMRS, especially where, as here, it can be done without harming GMRS. But even if, *arguendo*, GMRS had the greater need in general, the public interest would still be best served by rewarding MRA for its research efforts and granting its applications for these four specific markets, while reserving the rest of the country to GMRS.

CONCLUSION

There will be no harm whatsoever to GMRS from the MRA proposal. Accordingly, the Commission should expeditiously grant the MRA Waiver Request and the MRA applications.

Respectfully submitted,
MOBILE RELAY ASSOCIATES

November 7, 2013

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¹ *Id.*, pp. 2-3. (MRA's proposed power levels are set forth in MRA's four ULS applications.) Mark Abrams, MRA's principal, is a Ham Radio licensee since 1969, has personally installed over 3,000 repeaters, is a recognized expert in identifying sources of radio interference, including doing so for multiple GMRS clients of MRA, and has qualified as an expert witness on technical radio matters on multiple occasions before multiple fora. In addition, Mr. Abrams is an Advanced Class Amateur Radio Operator, a First-Class Radiotelephone licensee with radar endorsement, and former GMRS licensee and operator. Finally, MRA rents space for GMRS repeaters and would not cause harmful interference to its own GMRS site users/customers.